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Mr. Sean Sheldrake, RPM, Unit Diving Officer
US EPA, Region 10
Environmental Cleanup Office
1200 Sixth Avenue, Suite 900, ECL-110
Seattle, WA 98101-3140

RE: 2009 Gasco Sediments Order, EPA Docket Number 10-2009-0255 (EE/CA Order)

Dear Sean:

Attached please find a summary of proposed work Siltronic anticipates is needed to better refine the extent of Area 1 as anticipated in the EE/CA Order. More specifically, Siltronic is submitting this attachment to identify sampling work activities additional to those proposed in NW Natural's (NWN) Draft Pre-Remedial Basis of Design Technical Evaluations Work Plan, which was submitted to EPA on July 13, 2017. Siltronic requests that this sampling proposal be integrated into the Draft Work Plan submitted by NWN to ensure proper delineation of the Gasco Sediments Site. Unfortunately, this integration could not occur prior to NWN's submission due to NWN's refusal to consult with Siltronic as a joint and several party under the EE/CA Order. Without action from EPA to either require consultation between the parties or to remove Siltronic from the EE/CA Order, Siltronic will continue to provide EPA with addenda and corrections to address NWN's uncoordinated submissions.

As Siltronic has previously advised, Siltronic is concerned about the current direction and development of the EE/CA Order entered into jointly between Siltronic and NWN. Although the parties are jointly and severally responsible for all work, NWN is serving as the Project Coordinator and the performing entity for the work and is utilizing NWN's consultant. However, contrary to the coordination obligations under the March 2010, *Revised Final Work Plan, Gasco Sediments Cleanup Action*, the terms of which are incorporated into the EE/CA Order, NWN does not provide Siltronic with an opportunity for input before providing deliverables to EPA. This puts Siltronic in a difficult and somewhat untenable position.

In addition, the vast majority of contamination in the uplands and in river sediments is a result of Portland Gas and Coke (PG&C) /NW Natural activities. Therefore, the vast majority of the remediation work should be performed by NWN.



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As you recall, due to the above facts and concerns, Siltronic asked to be removed from this EE/CA Order when we met May 4, 2017 in Seattle. Because EPA has thus far indicated it wishes to keep Siltronic involved in this EE/CA Order, and because NWN continues to refuse to include Siltronic in the submittal development process as otherwise contemplated by the EE/CA Order, Siltronic has no choice but to provide comments and input to EPA as a separate deliverable consistent with the EE/CA Order. Unfortunately, separate, uncoordinated submissions will likely lead to inefficiencies, and the potential to cause delay and confusion.

Finally, in light of EPA's identification of other contaminants of interest (COIs) in this area, including pesticides and dioxins/furans, Siltronic believes it appropriate to understand the role they may play in the design of a remedy as anticipated by this EE/CA Order. Siltronic is concerned, however, whether NWN will also be evaluating the extent of those hazardous substances intermingled with historic PG&C waste to ensure comprehensive and compatible data is collected in all areas covered by the EE/CA Order.

Please feel free to contact me should you have any questions regarding this submission. Thank you very much.

Best regards,

Siltronic Corporation

Myron Burr

Attachment

cc: Mike Murray, MFA, via email
David Rabbino, Jordan Ramis, via email
Ilene Munk and Carolyn Long, Foley & Mansfield, via email
Dana Bayuk, ODEQ, via email
Sarah Greenfield, ODEQ, via email
Robert Wyatt, NW Natural, via email